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August 20, 2001

Project Number N7538

Mr. Harry Seveney
Chairman
Aquidneck Island Citizens Advisory Board
218 Indian Avenue
Portsmouth, Rhode Island 02871

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order 0282

Subject: Response to Aquidneck Island Citizens Advisory Board's Comments on the Draft Feasibility Study Report
Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island
Received in EPA letter to James Shafer of the U.S. Navy June 21, 2001

Dear Mr. Seveney:

The Navy has reviewed the comments provided by Aquidneck Island Citizens Advisory Board on the Draft Feasibility Study Report for the Old Fire Fighting Training Area site. The responses to the Board's comments are provided in the attachment (two copies). The Board's comments are presented verbatim in italic type followed by the Navy's response in standard type.

Please contact Jim Shafer of the Navy or me if you have any questions about this transmittal or would like to discuss this matter further.

Very truly yours,

James R. Forrelli, P.E.
Project Manager

JRF.rp

Enclosure

c: J. Shafer, NORTHDIV (w/enc. – 3)
M. Griffin, NAV STA Newport (w/enc. – 2)
K. Keckler, EPA (w/enc. – 2)
P. Kulpa, RIDEM (w/enc. – 4)
C. Powell, RIDEM (w/enc.)
K. Finklestein, NOAA (w/enc.)
M. Imbriglio, NAVSTA/RAB (w/enc – 5)
K. Andersen, CRMC (w/enc)
D. Egan, TAG (w/enc.)
J. Stump, Gannet Fleming (w/enc. – 2)
G. Tracey, SAIC (w/enc.)
J. Trepanowski/G. Glenn, TtNUS (w/enc)
C. Race, TtNUS (w/enc.)
File N7538-8.0 (w/enc.)/File N7538-3.2 (w/o enc. – 2)

ATTACHMENT
Responses to Comments from the
Aquidneck Island Citizens Advisory Board
Old Fire Fighting Training Area Draft FS For
Soil and Marine Sediments (April 2001)
Comments dated June 21, 2001

No. *Comment*/Response

1. *Comment: The area of soil contamination identified as part of the site and delineated for purposes of evaluating cleanup appears to follow fence lines on the southern boundary (see Figure 2-3). It is unlikely that the contamination is restricted by the presence of these fence lines. Were samples collected outside the fence line? If so, were they below the Preliminary Remediation Goals (PRGs) identified in the FS? If not, please explain how the areas outside the fence line will be addressed?*

   Response: The southern boundary limits of the site are Taylor Drive, the area around Building 144, and the parking lot to the east of Building 144. Samples from MW-5S, MW-6R, MW-6S, TP-01, and B-18, all south of the OFFTA boundary were tested and did not exceed PRGs. Therefore, the fence line was used to estimate the area of contamination to be addressed for the purposes of the FS. Further sampling will be performed during the pre-design investigation and during active remediation to ensure that all soil exceeding PRGs is addressed, including the areas south of the fence line.

2. *Comment: The onshore areas were subject to extensive investigation while the marine areas (shoreline, nearshore and offshore) were subject to only limited investigation, yet both areas have projected cleanup scenarios ranging from $4M to $8M.*
   - *For example, based on Tables 2-6 and 2-7, there were >110 samples collected from the onshore areas, whereas there appears to be <20 samples collected from the marine areas (based on a review of Figure 2-2).*
   - *Further, Table 2-11 shows that there were 55 surface samples that exceeded PRGS, which presumably served as the basis for calculating an area of contamination of 229,000 square feet. This represents approximately one sample for every 4,100 square feet of onshore contamination. In contrast, Table 2-16 shows 8 sample locations that exceeded PRGs in the nearshore and shoreline areas, which presumably served as the basis for calculating an area of 130,500 square feet. This represents one sample for every 16,300 square feet.*
   - *EPA guidance for conducting RI/FS (EPA 540/G-89/004) states that the cost estimates in an FS must be accurate to +50% and –30% (p. 6-12). It is not clear how the cost estimates for the marine area can meet this FS requirement when it was based on approximately one-fourth the data needed to characterize the onshore areas, especially since the heterogeneity of the marine areas is expected to be the same or greater than the onshore areas. If the RI data are not adequate for the marine areas to meet the requirements of the FS, then the FS should not be finalized until necessary data are collected.*

   Response: More soil samples were collected because the potential for exposure in that area was much higher. The offshore data are adequate for the purposes of the FS, in that the magnitude of the risk has been identified, and the possible alternatives for risk reduction have been identified. These study endpoints would not change with additional data collected; rather, there would only be a better understanding of the possible costs. Although cost is a factor in remedy selection, it is only one factor, and the others (implementability, effectiveness, protection of the environment, etc., override cost in most cases. Therefore, the FS can be finalized with the understanding of the limitations shown.

3. *Comment: The cost estimates for remediation of the onshore soils ranged from approximately $8M to $11M (not including the No Action alternative). Table 1-1 shows that the calculated non-cancer risks were all below the action level. It also shows that the calculated cancer risks were all within the range of 10^{-4} to 10^{-6}, where remediation is not required but is left to a risk management decision. However, all of the calculated risks were based on the Reasonable Maximum Exposure, and values for the Central Tendency Exposure (CTE) were not provided, although the CTE is more representative of a long-term exposure scenario. As shown on Table 1-2 for the marine areas, both the CTE and RME should be provided in Table 1-1. Further, if the Navy and the regulatory agencies determine that remedial actions are warranted for onshore soils, the results of the risk assessment indicate that the site should not be a high priority for cleanup.*

   Response: The RME risk is presented for each scenario/receptor combination. The CTE is presented only when the RME cancer risk exceeds 10^{-4} or if the RME non-cancer risk exceeds 1 for any target organ. This is in accordance with the risk assessment procedure in the Risk Assessment. Footnotes will be added to Tables 1-1 and 1-2 to indicate that this is what was done.

   It is typical to use the RME risks instead of the CTE in determining the need for remedial action and in calculating risk-based clean up goals. The results of the RME risk assessment will be one of the factors used in determining the prioritization of the funding allocation for remediation.